

BORAH GOLDSTEIN
ALTSCHULER NAHINS & GOIDEL, P.C.



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August 31, 2022

Via ECF

Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street--Courtroom 14A
New York, New York 10007-1312

The time to respond to the complaint is extended to October 7, 2022. The conference scheduled for September 29, 2022 is canceled. SO ORDERED.

Sept. 1, 2022 /s/ John G. Koeltl
New York, NY John G. Koeltl, U.S.D.J.

Re: Vernita Worrell v. Barachou, LLC
and 184 West 82nd Street L.L.C.
United States District Court
Southern District of New York
Case No. 22-cv-06476 (JGK)

Honorable Judge Koeltl:

This firm has been retained to represent Defendant 184 West 82nd Street L.L.C. ("184 LLC") in the above-referenced matter. We respectfully request: (a) an extension of time for 184 LLC to answer, move or otherwise respond to the Complaint from the current due date of September 6, 2022, to and including October 7, 2022; and (b) a thirty day (30) day adjournment of the Initial Conference, currently scheduled for September 29, 2022 at 12:00 P.M.

This is 184 LLC's first request for an extension of time to answer and for an adjournment of the Conference.

Both requests are being made to afford 184 LLC further time to investigate the allegations of the Complaint, to respond to the allegations, and to discuss settlement with Plaintiff's counsel, and/or with the Co-Defendant.

Neither request interferes with any other scheduled dates.

The requests are with the consent of Plaintiff's counsel.

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Wherefore, I respectfully request that the Court grant the extension of time for 184 LLC to file its answer to the Complaint until October 7, 2022 and to grant a thirty (30) day adjournment of the Conference.

Thank you.

Respectfully submitted,

/s/ Jeffrey C. Chancas
JEFFREY C. CHANCAS